



ENVIRONMENTAL & WATER
RESOURCES DEPARTMENT
50 NATOMA STREET
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December 14, 2012

Ms. Wendy Wyels
State of California
Water Quality Control Board – Region 5
11020 Sun Center Drive
Rancho Cordova, CA 95670

SUBJECT: RESPONSE TO COMPLIANCE EVALUATION AUDIT, CITY OF FOLSOM COLLECTION SYSTEM, SACRAMENTO COUNTY

At the request of the State Water Resources Control Board's Office of Enforcement (OE) and the Regional Water Quality Control Board (RWQCB), the City of Folsom has completed here within a technical report responding to each of the violations and areas of concerns identified in the *Compliance Evaluation Audit, City of Folsom Collection System, Sacramento County* Letter that was received as a result of the OE and RWQCB unannounced visit on October 3rd, 2012.

Listed below are the City of Folsom's responses to each of the violations and areas of concerns identified by the OE & RWQCB staff during the collection system inspection on October 3rd-4th, 2012.

Violation #1:

The City is deficient in preventative maintenance relating to fats, oils, and grease (FOG) control for commercial and residential assets (SSSWDRs, section D.13(vii)).

Response:

In response to Violation #1, the City has reviewed Section D.13(vii) of the SSWDR and assessed its current FOG program. The City identified areas of success along with areas of deficiency. The tables listed below, outline the City's current FOG program (Table 1) and its plan of action to improve the FOG program (Table 2) in order to improve compliance with Section D.13(vii) of the SSWDR. All proposed changes will begin taking place in January of 2013.

Table 1		
Current FOG Control Program		
Item No.	Activity	Goal
1	Provide FOG outreach packets to Food Service Establishment's (FSE's) during the permit process.	Educate FSE's about FOG BMP's
2	Review new FSE's and Tenant Improvement Projects during the plan review process.	Ensures the appropriate Grease Control Device is being installed per Folsom Municipal Code, Title 13)
3	Sewer Use Ordinance (Folsom Municipal Code Title 13)	Regulate and Enforce the Sewer Use Ordinance as necessary
4	Current FOG outreach program directs businesses and residents of Folsom to www.stoptheclog.com	Educate businesses and residents about FOG BMP's

Table 2		
Proposed Improvements to the City's FOG Control Program (January 2013)		
Item No.	Activity	Goal
1	<u>Restaurant Inspection</u> - Inspect restaurants to educate and enforce BMP's for food service establishments through the City of Folsom.	Inspect Folsom's 340 restaurants over a 2 year period.
2	<u>Website Updates</u> - Update the City's website to provide numerous FOG related BMP's, "How To" articles, and education material for businesses and residents. Topics will include: <ul style="list-style-type: none"> ○ Why a FOG program is needed ○ FOG backup and overflow causes and prevention. ○ FOG frequently asked questions, fact sheets, and information ○ Proper disposal of FOG BMP's ○ "How To" recycle kitchen grease ○ New restaurant FOG BMP checklist ○ Grease interceptor cleaning record Verification Form ○ Requirements for new and remodeled FSE's 	Provide businesses and residents with more useful and effective education and outreach material

	<ul style="list-style-type: none"> ○ Selecting a grease hauler ○ A list of licensed grease haulers in the Sacramento area ○ Grease removal device maintenance & logs ○ Equipment Cleaning (Floor mats, grills, garbage cans, etc.) 	
3	<p>Public Outreach - Implement a more robust FOG public outreach program. The program will include:</p> <ul style="list-style-type: none"> ○ Prepare packets with fact sheets, FAQs, grease removal tools for distribution to customers. ○ Target grease related SSO's and Hot Spots for education and outreach through the use of information and FOG packets. ○ Educate businesses and residents about FOG during water conservation calls, public works day and other outreach events. ○ Provide FOG related outreach material on a semi-annual basis through customer bill inserts 	Reduce the number of FOG related SSO's

Violation #2:

The City is not sufficiently maintaining Pump Station No. 2. Significant solids were noted in the wet well during the inspection. (SSSWDRs, section D.13(vii))

Response:

In response to Violation #2, the City has increased the frequency of maintenance at Pump Station No. 2. The updated Standard Operating Procedure (SOP) for Pump Station No. 2, which was implemented in November 2012, requires the wastewater crews to perform the following:

- Check Pump Station No. 2 for solids buildup in the wet well three times a week (Monday, Wednesday and Friday); previously once a week.
- During each Pump Station check, the wastewater crew is required to draw the level of the wet well down to a point between the sewer inlet pipes and the suction pipe (See Figure 1). The turbulence of the flow coming into the wet well helps break apart any solids buildup that may have begun to form.
- In addition, during this time the wastewater crew will use the high pressure hose from the Vactor truck to clean the sidewalls of the wet well. Performing the

maintenance at Pump Station No. 2 as described above, resulted in a relatively free solids buildup within the wet well (See Figure 2).

Area of Concern #1:

The City was unclear on who had ownership of the Folsom Prison line and who is responsible for operations, maintenance and management of each segment of the sewer line.

Response:

In response to Area of Concern #1, a meeting was held on October 24th, 2012 to discuss the Agreement between the City and the Folsom State Prison (Prison). After discussing the Agreement, the City and the Prison came to the following the resolution:

- The City is responsible for operating and maintaining the 20-inch sewer south of the Prison fence line (See Figure 3).
- The Prison is responsible for all costs borne by the City associated with the operations and maintenance of the 20-inch sewer line.
- All costs for capital improvements on the 20-inch sewer line shall be borne by the Prison

Area of Concern #2:

The City is deficient in maintaining manhole covers throughout the collection system. During the inspection, some of the manhole covers seemed to be fairly corroded when the lid was opened.

Response:

In response to Area of Concern #2, the City has incorporated a corrosion inspection component to its City-wide Condition Assessment Program. The City has added manhole lid assessment and rating to the existing Manhole Inspection Standard Operating Procedure. The Manhole Lid Corrosion Form (See Figure 4) has been added to the Work Order Program and wastewater crews inspect and rate each manhole frame and cover. Based on the rating, manhole frames and lids will be scheduled for repair, replacement or follow-up inspection.

Area of Concern #3:

Field data collection and record keeping practices for SSOs reaching the municipal storm drain system are inadequate. Water Board staff noted discrepancies in the estimated spill volumes and recovered spill volumes between field data sheets and CIWQS data entries. Field Data collection and quality assurance procedures should be improved to ensure accuracy of data regarding the SSO volume discharged and recovered from the municipal storm drains system.

Response:

In response to Area of Concern #3, the City has modified its Sanitary Sewer Overflow (SSO) procedures for spills that reach a drain inlet during dry and wet weather conditions.

During dry weather conditions, when an SSO reaches a drain inlet (DI), wastewater crews are required to inspect each storm drain manhole downstream of the affected DI until the SSO has been contained. Procedures to prove that the SSO was contained within the DI sump include visual inspection, verifying that the sump level is lower than the invert elevation of the outlet pipe, taking pictures of the sump level, sampling the storm drain sump that contained the SSO, and sampling the downstream storm drain sump to verify no presence of the SSO.

During a wet weather event, wastewater crews will follow the same procedure as described above during dry weather conditions. The wastewater crews will continue to sample downstream DI sumps, comparing Dissolved Oxygen levels to determine where the SSO was contained. If wastewater crews cannot prove that the SSO has been contained within a storm drain sump, the wastewater crew will assume that the spill reached a waterway and follow Category 1 SSO Emergency Response Protocols for spills that reach a waterway as outlined in the City's Sewer System Management Plan (SSMP).

Area of Concern #4:

The City can improve scripts to get all the information possible for when the public reports a spill.

Response:

In response to Area of Concern #4, the City has modified its Standard Operating Procedure for SSO related phone calls (See Figure 5). The new SSO Call-Out Questionnaire will include asking the caller the following information:

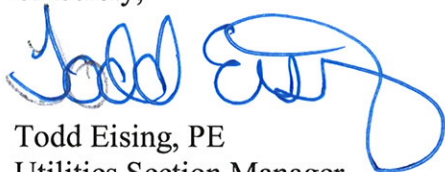
- Contact Information (Name, Phone Number)
- Location of the SSO
- Estimated Start Date and Time of the SSO
- Estimated spill volume
- Estimated spill area
- Is the spill entering a waterway or storm drain?
- Recommending that the caller stops using water such as the washing machine, dishwasher, etc. until the SSO has been contained.

The SSO Call-Out Questionnaire script will be provided to all Departments within the City that have interaction with the public.

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If you have any questions regarding the information provided, please contact me at (916) 351-3502 or by e-mail at teising@folsom.ca.us.

Sincerely,



Todd Eising, PE
Utilities Section Manager
Environment and Water Resources

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ATTACHMENT #1

FIGURES

Figure 1 – Drawing wet well levels down between the inlet pipes and the suction pipes



Figure 2 – Wet well area, relatively free of solids buildup



Figure 3 – City of Folsom & FSP Sewer Line Area of Responsibility

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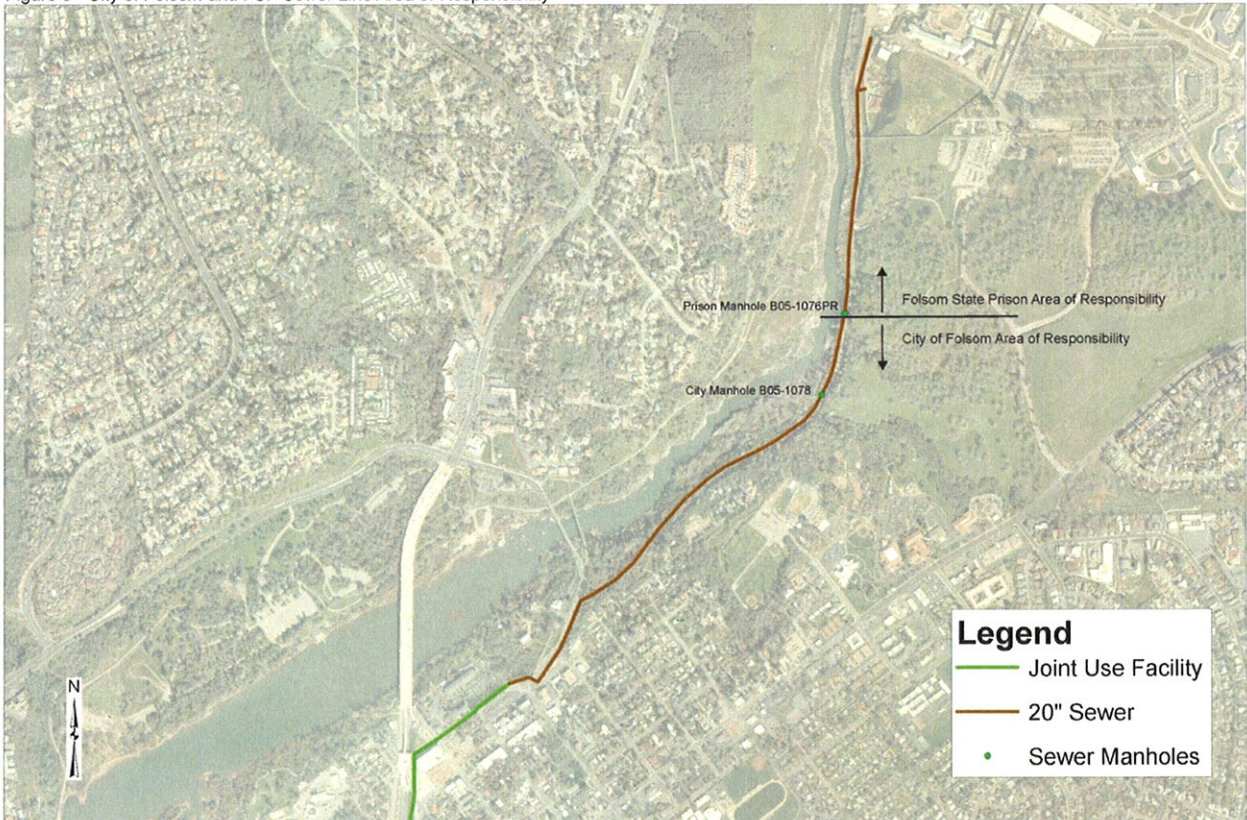


Figure 4 – Manhole Frame & Cover Corrosion Inspection Form

Structure Inspection - No Filter

Network Structure: B03-7384 Inspection Date: 10/01/2002 Most Recent Inspect ☐

Flow Basin: B03

General Components Defects Defect Summary Custom Comments

Item	Flow		General Cond.	Broken		Corrosion Roots				I/I		Number of		
	Rate	Actual		S	D	S	D	S	D	Code	Type	Holes	Cracks	Joints
Cover	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Frame	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Frame Seal	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Grade Adj.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Cone	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Wall	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Bench	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Trough	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Record 1 of 11673 View Mode Ready...

Figure 5 – SSO Call-Out Questionnaire

SSO Call-Out Questionnaire			
Name:		Number: Home	
		Cell	
Location of SSO:		Est start Time:	
		Est start Date:	
Description of SSO:	Estimated spill volume		
	Estimated spill area		
	Is the spill reaching a Storm Inlet/ Waterway		
Suggest:	<u>Turning off water, Dishwasher, laundry, etc..</u>		
	<u>Let resident know not to wash down the spill.</u>		

SSO Call-Out Questionnaire			
Name:		Number: Home	
		Cell	
Location of SSO:		Est start Time:	
		Est start Date:	
Description of SSO:	Estimated spill volume		
	Estimated spill area		
	Is the spill reaching a Storm Inlet/ Waterway		
Suggest:	<u>Turning off water, Dishwasher, laundry, etc..</u>		
	<u>Let resident know not to wash down the spill.</u>		